

1 HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
2 REED GRANTHAM, CA Bar #294171
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

6 Attorneys for Defendant
RYAN WILSON
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 RYAN WILSON,

15 Defendant.
16

Case No. 1:21-cr-00315-DAD-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER**

Date: October 12, 2022

Time: 1:00 p.m.

Judge: Hon. Barbara A. McAuliffe

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Ryan Wilson, that the status conference currently
20 scheduled for August 24, 2022, at 1:00 p.m. may be continued to October 12, 2022, at 1:00 p.m.

21 On May 13, 2020, this Court issued General Order 618, which extended the previous
22 restrictions on courthouse access and in-court hearings until further notice from the Court. This
23 General Order was entered to address public health concerns related to COVID-19. By this
24 stipulation, the parties now move to continue the current status conference until October 12,
25 2022, and to exclude time between August 24, 2022, and October 12, 2022, under 18 U.S.C. §§
26 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv).

27 The parties agree and stipulate, and request that the Court find the following. The
28 government has provided initial discovery in this matter. The defense remains in the process of

1 reviewing the discovery, conducting further investigation, and discussing the matter with his
2 client. The requested continuance will conserve time and resources for the parties and the Court.
3 Counsel for defendant believes that failure to grant the above-requested continuance would deny
4 him the reasonable time necessary for effective preparation, taking into account the exercise of
5 due diligence. The government does not object to the continuance.

6 Based on the above-stated findings, the ends of justice served by continuing the case as
7 requested outweigh the interest of the public and the defendant in a trial within the original date
8 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
9 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of August 24,
10 2022, to October 12, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. §§
11 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by
12 the Court at defendant's request on the basis of the Court's finding that the ends of justice served
13 by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

14 Respectfully submitted,

15 PHILLIP A. TALBERT
16 United States Attorney

17 Date: August 18, 2022

/s/ Kimberly Sanchez
18 KIMBERLY SANCHEZ
Assistant United States Attorney
19 Attorney for Plaintiff

20 HEATHER E. WILLIAMS
21 Federal Defender

22 Date: August 18, 2022

/s/ Reed Grantham
23 REED GRANTHAM
Assistant Federal Defender
24 Attorney for Defendant
RYAN WILSON

ORDER

IT IS SO ORDERED. The status conference currently scheduled for August 24, 2022, at 1:00 p.m. is hereby continued to **October 12, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. The time period to October 12, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: August 18, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE